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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

ORBIT ENERGY & POWER, LLC

Debtor.

Hon. Andrew B. Altenburg, Jr.

Case No. 22-19628 (ABA)

Chapter 7

Hearing Date: July 30, 2024

**NOTICE OF MOTION TO APPROVE SETTLEMENT AGREEMENT
BETWEEN ANDREW SKLAR, AS CHAPTER 7 TRUSTEE OF ORBIT
ENERGY & POWER, LLC AND PEIRCE-PHELPS, LLC.**

TO: All Parties-in-Interest

PLEASE TAKE NOTICE that on July 30, 2024 at 10:00 a.m., or as soon thereafter as counsel may be heard, the undersigned counsel for Andrew Sklar, as Chapter 7 trustee (the "Trustee") for Orbit Energy & Power, LLC ("Debtor"), shall move before the Honorable Andrew B. Altenburg, Jr., United States Bankruptcy Judge, at the United States Bankruptcy Court, Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4th Floor, Camden, N.J. 08101, Courtroom 4B, for entry of an order (the "Order") reopening the case and approving the settlement agreement ("Settlement Agreement") by and between the Trustee and Peirce-Phelps LLC, which is attached as **Exhibit A** to the Certification of Andrew Sklar in support of the motion (the "Sklar Certification"), and for related relief (the "Motion").

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Memorandum of Law and Sklar Certification, which set forth the relevant factual and legal bases upon which the relief requested should be granted. A proposed Order granting the relief requested in the Motion is submitted herewith.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall be filed with the Court and served upon the undersigned no later than seven (7) days prior to the hearing date hereupon. Unless objections are timely filed and served, the relief requested in the Motion may be granted without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that the undersigned requests oral argument on the return date of the Motion if objections are timely filed.

Dated: June 28, 2024

Respectfully submitted,

SKLAR LAW, LLC
Attorneys for Andrew Sklar, Chapter 7 Trustee

By: /s/Andrew Sklar
Andrew Sklar, Esquire